

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

UNITED STATES OF AMERICA)
)
)
V.) **CR. NO.: 3:06cr191-MHT**
)
)
SPRING M. DAWSON)

UNOPPOSED MOTION TO CONTINUE TRIAL

NOW COMES the Defendant, **SPRING M. DAWSON**, by and through undersigned counsel, Jennifer A. Hart, and pursuant to 18 U.S.C. §§ 3161(h)(2) and 3161(h)(8)(B)(I), respectfully moves this Court to continue the trial of this action from the present trial date of June 4, 2007, to allow for the final resolution of pretrial diversion in this matter. In support of this Motion, defendant would show:

1. The United States Attorney Office has approved Ms. Dawson for pretrial diversion.
2. This case is now in the hands of the United States Probation Office for completion of the pretrial diversion "work up". Once the work up is completed, the government will file its Motion to Dismiss the Information.
3. Because prosecution will be deferred/diverted, pursuant to the agreement upon the final work up, it is in the interest of justice to continue trial in this matter so as to allow the parties to finalize Ms. Dawson's diversion agreement. 18 U.S.C. §§ 3161(h)(2) and 3161(h)(8)(B)(I).
4. The Government, through Assistant United States Attorneys, Kent Brunson, has no opposition to the granting of a continuance.

WHEREFORE, defendant respectfully requests that this Motion be granted.

Dated this 18th day of May, 2007.

Respectfully submitted,

s/Jennifer A. Hart
JENNIFER A. HART
FEDERAL DEFENDERS
MIDDLE DISTRICT OF ALABAMA
201 Monroe Street, Suite 407
Montgomery, AL 36104
Phone: (334) 834-2099
Fax: (334) 834-0353
jennifer_hart@fd.org
AL Bar Code: HAR189

CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Kent Brunson, Assistant U. S. Attorney.

Respectfully submitted,

s/Jennifer A. Hart
JENNIFER A. HART
FEDERAL DEFENDERS
MIDDLE DISTRICT OF ALABAMA
201 Monroe Street, Suite 407
Montgomery, AL 36104
Phone: (334) 834-2099
Fax: (334) 834-0353
jennifer_hart@fd.org
AL Bar Code: HAR189
Respectfully submitted,